



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

Reply To
Attn Of: ECL-115

September 4, 2007

James M. Anderson, Manager
Oregon Department of Environmental Quality
Northwest Region Portland Office
Portland Harbor Section
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987

RE: Source Control Decision
Paco Pumps
2551 NW 30th Avenue, Portland, Oregon
ECSI No. 146

Dear Mr. Anderson:

EPA Region 10 has reviewed DEQ's revised Source Control Decision (SCD) for the Paco Pumps site. EPA agrees that sources of contaminants from this site have been effectively controlled based on the information provided; however, there may be a need for further source control actions at this site in the future to ensure that pollutants from this upland site do not contribute to risk or recontamination of the Portland Harbor Superfund Site (PHSS). If DEQ goes forward with a "no further action" letter, EPA may still require further source control actions under CERCLA.

EPA is concerned about the high metals and PCB values in the storm sewer lines and the lack of post source control storm water monitoring from the site, although EPA views the storm water pathway from this site as a low priority. It is unclear from the information provided how the storm water from the site drains to the City's sewer system; it would be preferential to have a map of the storm drainage area as discussed in the JSCS. It is also unclear as to the extent of paving of the site relative to the soil sample locations. It would have been helpful to have a map of the redeveloped site.

Based upon the information contained in the SCD, EPA recommends that storm water monitoring for this site must be conducted to obtain the mass loading rate of chemicals of concern and volume discharged during significant storm events. Therefore, all media (e.g., water and sediments) of the storm water discharge from this site should be monitored during at least five storm events greater than 0.1 inch rainfall preceded by at least 72 hours of dry weather. Additionally, samples should be collected in-line as a flow-proportioned composite and analyzed for metals (especially copper, lead, and zinc), PCBs, PAHs, and phthalates using analytical methods that quantitate the rate of discharge (e.g., grams per day).

If you have any questions or would like to discuss the contents of this letter further, please feel free to contact me at (206) 553-6705.

Sincerely,

Kristine Koch, Remedial Project Manager
U.S. EPA

cc: Matt McClincy, DEQ/NWR
Chip Humphrey, EPA-OOO
Eric Blischke, EPA-OOO